

RE: NICKOLAS J ZITKO

) Case No. 16 B 09618
)
debtor) Chapter 13
)
) Judge: JACQUELINE P COX

NOTICE OF MOTION

NICKOLAS J ZITKO

7254 KEDVALE AVENUE
LINCOLNWOOD, IL 60712

SULAIMAN LAW GROUP LTD
via Clerk's ECF noticing procedures

Please take notice that on April 25, 2016 at 9:00 am my designee or I will appear before the Honorable Judge JACQUELINE P COX at 219 South Dearborn Courtroom 680, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on April 14, 2016.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO FILE
REQUIRED DOCUMENTS UNDER SECTION 521 (a) (1)**

Now comes Tom Vaughn, Trustee in the above entitled case and moves this Honorable Court to dismiss this case for cause pursuant to 11 U.S.C. § 1307 (c) and in support thereof states as follows:

1. That the Debtor filed the current petition for relief on March 21, 2016.
2. That the above-captioned plan has not yet been confirmed.
3. Debtor has failed to file the following documents within 14 days of filing the petition;

Debtor has failed to file a Cmi.

4. 11 U.S.C. §521 (a) (1) requires the debtor to file specified documents.
5. Rule 1007 (c) Rules of Bankruptcy Procedure require that certain documents be filed with the petition, or within 14 days thereafter.

WHEREFORE, the Trustee requests that this court dismiss this case for cause under 11 U.S.C. § 1307 (c) and for any and all other relief this court deems just and proper.

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn